

November 18, 2005

Michael Gallagher
Washington State Department of Ecology

Dear Mr. Gallagher:

On behalf of Washington Physicians for Social Responsibility's physicians, nurses, and children's health advocates, we urge you to finalize a strong PBT rule which maintains the inclusion of phthalates and includes lead and other metals as chemicals to be addressed. It is crucial that the PBT rule embody a solid framework from which to address phasing out persistent toxic chemicals. This is essential for protecting the health and potential of children, our most vulnerable population, as well as the public health of communities throughout Washington State.

We appreciate the work that you and the Department of Ecology have taken in developing the draft PBT rule. As the rule is finalized, we want to underscore that it is critical that the emphasis be placed on children's health, and that the rule has the ability to function to protect our children from toxic environmental exposures -- from preventable sources of harm.

Phasing out persistent toxic chemicals is essential for reducing the health impacts associated with these exposures, including learning and behavioral problems, cancers, reproductive failure, and other health problems. The PBT rule has the potential to provide us with a mechanism to protect children from exposures which currently occur as a result of everyday activities, such as eating fish containing mercury, ingesting lead from dust, and being exposed to phthalates through an array of plastic products.

We would like to reiterate from our previous comments that a strong rule should encompass a goal to phase out persistent toxic chemicals, and be based upon a framework of prevention. It is vital that phthalates remain on the list of chemicals to phase out. In addition, we advocate that additional phthalates be included, particularly di-ethylhexyl phthalate (DEHP). This phthalate is linked to reproductive damage, particularly in male infants, as well as other serious health concerns. It is important to take action on this phthalate now, to avert continued exposures to a chemical linked to harm. In addition, the Washington State Public Health Association and the Washington State Medical Association both passed resolutions in Fall, 2005 urging adoption of safer, alternative products to those containing DEHP.

It is also essential that the PBT rule include lead. Exposures to even small amounts of lead results in permanent damage to child brain development, resulting in lowered IQ, as well as other learning difficulties and behavior problems. These exposures are preventable, and it is critical that they are addressed. Children are not little adults. For example, they absorb approximately 50% of ingested lead where as adults only absorb approximately 10%. Lead substitutes for calcium, thus bioaccumulating in bone and when mobilized along with calcium during pregnancy, exposes the developing fetus to lead. Lead clearly meets the definition of a PBT.

WPSR members are joined by health professionals throughout Washington State in supporting elimination of PBTs. The Washington State Medical Association, the Washington Chapter of the American Academy of Pediatrics, the Washington Academy of Family Physicians, the Washington

State Nurses Association, and the Washington State Public Health Association, all support phasing out the use of PBTs.

In closing, we ask you to finalize a strong PBT rule that includes phthalates and lead as part of a broad list of chemicals. This is essential in order to create an environment in which our children are able to learn, grow and play without harm from exposures to persistent toxic chemicals – an environment which we, as adults in society, have an ethical obligation to provide.

Thank you for your time and consideration of these comments.

Sincerely,

Nancy Dickeman
Toxics Coordinator
Washington Physicians for Social Responsibility